IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

VICTOR SMITH,)	
Plaintiff,)	
v.)	CASE NO: 3:05 CV 1186
EURO-PRO OPERATING, L.L.C.,)	
EURO-PRO MANAGEMENT COMPANY)	
CORP. and STANRO-EP CORP.,	•)	
Defendants.)	
	,	

DEFENDANT'S VERIFIED BILL OF COSTS

COMES NOW counsel for Euro Pro Management Services, Inc. ("Defendant"), and answers that the matters contained herein are true and correct.

- 1. On March 7, 2007, this Court entered Judgment in favor of Defendant as to all Counts of the Plaintiff's Complaint and taxed costs against Plaintiff.
- 2. Defendant incurred the following costs for deposition transcripts, copies of transcripts and court reporter fees in this matter:

Victor Smith deposition		\$ 717.60
Ralph Hudnall deposition		\$ 404.35
	Total	\$1 121 95

3. The depositions taken and deposition transcripts purchased by Defendant in this matter were necessary to Defendant's defense, and the transcripts were relied upon by Defendant in support of its Motion for Summary Judgment.

4. Defendant incurred the following costs for copies in this matter:

Third-Party Duplicating Costs (subpoenaed documents, etc.) \$ 99.70

Maynard, Cooper & Gale Internal Copies

\$ 297.70

Grand Total = \$ 397.40

- 5. The above-described copies were necessary to Defendant's defense, and many of the copies relate to Defendant's Motion for Summary Judgment and supporting briefs.
- 6. Attached hereto as Exhibit A are true and correct copies of the invoices for these costs.

Accordingly, Defendant respectfully requests that the Court award costs to Defendant Euro Pro Management Services, Inc. in the amount of \$1,539.35.

Respectfully submitted by,

/s/ Warren B. Lightfoot, Jr.

Warren B. Lightfoot, Jr. Attorney for Defendant Euro-Pro Management Services, Inc.

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C. 2400 AmSouth/Harbert Plaza 1901 Sixth Avenue North Birmingham, Alabama 35203-2618 Telephone: 205.254.1000

Facsimile: 205.

205.254.1000 205.254.1999

Email: wlightfoot@maynardcooper.com

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March, 2007, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

John I Cottle, III Bowles & Cottle 2 South Dubois Avenue P.O. Box 780397 Tallassee, AL 36078

/s/ Warren B. Lightfoot, Jr.

OF COUNSEL

EXHIBIT A

FREEDOM REPORTING, INC.

367 Valley Avenue Birmingham, AL 35209 205-397-2397 Tax ID Number: 20-2776665

Warren B Lightfoot, Jr Maynard, Cooper & Gale 2400 Amsouth/Harbert Plaza 1901 Sixth Avenue North Birmingham, AL 35203

June 2, 2006

Invoice# 00012364

Balance: \$717.60

Re: Victor Smith vs Euro-Pro Operating, LLC, et al Tallassee, AL / 3:05-CV-1186

on 05/24/06 by Angela Smith McGalliard

Invoicing Information

Charge Description	Amount
Per Diem: 1	120.00
Original: 188 pages	573.40
Exhibits/B & W: 12	4.20
Condensed/concordance	10.00
Ascii	10.00

Witness: Victor Smith

Please Remit ---> Total Due: \$717.60

WE APPRECIATE YOU!

FREEDOM REPORTING, INC.

367 Valley Avenue Birmingham, AL 35209 205-397-2397 Fax: 205-397-2398 Tax ID Number: 20-2776665

Warren B Lightfoot, Jr Maynard, Cooper & Gale 2400 Amsouth/Harbert Plaza 1901 Sixth Avenue North Birmingham, AL 35203

November 10, 2006

Invoice# 00019414

Balance: \$404.35

Re: Victor Smith vs. Euro-Pro Management Services, Inc. TALLASSEE/3:05-CV-1186-MEF on 10/04/06 by Jackie Parham

Invoicing Information

Charge Description	Amount
Copy: 181 pages	371.05
Exhibits/B & W: 38 pages	13.30
Condensed/concordance(s):	10.00
Ascii:	10.00

Deponent:

Ralph Hudnall - Read and Sign

- * Copy and exhibits sent by reporter via mail
- * Read and Sign included with transcripts

Please Remit ---> Total Due: \$404.35

All Invoices are due within 30 days of receipt



Leah V. Burrus, Paralegal
DIRECT 205.488.3599
EMAIL lburrus@maynardcooper.com

July 25, 2006

Attn: Kay Lindsey Equal Employment Opportunity Commission Birmingham District Office 1130 22nd Street South, Suite 2000 Birmingham, Al 35205-1130

RE: Euro-Pro Operating, L.L.C., Euro-Pro Management Co. Corp. and

Stanro-EP Corp., Respondent Victor D. Smith, Charging Party Charge No.: 130-2005-00853

Dear Ms. Lindsey:

Enclosed please find a check in the amount of \$14.70 made payable to Pete's Print & Copy for the copy of Mr. Smith's investigative file. Thank you for your assistance in this matter.

Sincerely,

Leah V. Burrus

Paralegal

/lvb Enclosure

cc: Warren B. Lightfoot, Jr., Esq.

Case 3:05-cv-01186-MEF-WC Document 36 Filed 03/15/2007 Page 8 of 11

CHECK NO.: 1069874 VENDOR ID: 01674 VENDOR NAME: Pete's Print & Copy Center

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CHECK DATE 07/24/06

Amsouth Bank P. O. Box 11007 Birmingham, AL

FOURTEEN AND 70/100 Dollar

TO THE ORDER OF

Pete's Print & Copy Center

MAYNARD, COOPER & GALE, P.C.

1901 SIXTH AVENUE NORTH 2400 AMSOUTH/HARBERT PLAZA BIRMINGHAM, ALABAMA 35203-2602 TELEPHONE (205) 254-1000 CORP SWEEP

1069874 CHECK NO.

61-1/620

CHECK AMOUNT

TWO SIGNATURES REQUIRED IF > \$3,000

Accounting Center 2421 North Glassell Street, Orange, CA 92865 714 921 8003 VOLT

www.volt.com

workfarce

Date: 06-23.06	From: Kate Ray – Employment Verifications
To: Reals V Burres	Phone: 714-921-8003 (ext. 8922)
Company: Maynard Cooper & Stale	
Fax 205-254-1999	
Re: Victor D. Smoth	
Pages: 1	
Urgent For Review X Please Comment	Please Reply Please recycle

To Whom It May Concern:

We have received an inquiry from your organization requesting employment and/or wage verification for the above mentioned Volt employee. To provide this request there will be a service charge of \$15.00 made payable to Volt Management Corporation. Please be sure to put the employee name and SSN on the check. You can mail it to the address listed below. Thank you in advance for your cooperation in this matter.

Attn: Kate – Employment Verifications Volt Management Corporation PO Box 13500 Orange, CA 92857

Thank you, Kate Ray Employment Verification Clerk AL Dept of Ind Relations APA FY 2004

Filed 03/15/2007

Page 10 of 11

Invoice

Invoice Number: 2006060224

> Invoice Date: Jun 28, 2006

> > Page:

Duplicate

Voice: (334) 242-8438 (334) 242-8299 Fax:

Montgomery, AL 36131

649 Monroe Street

Sold To: L V Burrus Constangy, Brooks& Smith 1901 Sixth Ave N STE 1410 Birmingham, AL 35203

Remit to:

Department of Industrial Relations Finance Division Attn: Central Cashier 649 Monroe Street, Room 2684 Montgomery, AL 36131

	EIN # 63-600	0619		
Customer ID	Customer PO	Payment Terms		
L V Burrus		Prep	aid	
Sales Rep ID	Shipping Method	Ship Date	Due Date	
	Airborne		6/28/06	

		Airbon	Airborne			<u> </u>	6/28/06	
Quantity			Description			Unit Price	Extension	
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70.00 Subtotal Sales Tax **Total Invoice Amount** 70.00 Payment/Credit Applied 70.00 **TOTAL**

Direct Invoice/Billing questions to: Tamaya Knox (334) 242-8438 Direct Product/Service questions to: Trich Till (334) 242_8081

Check/Credit Memo No:

and engine		Worked	Billed	
CostCode	WorkPeriod	Amount	Amount	Description
1	1206	1199.12		Computer research
Subtotal 1	1.200	1199.12		Computer research
103	1006	11.53	11.53	Meals and entertainment
Subtotal 103		11.53		Meals and entertainment
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27	0106	4.29	4.29	Long distance telephone
27	0107	.42		Long distance telephone
27	0206	5.05	5.05	Long distance telephone
27	0207	1.56	1.56	Long distance telephone
27	0306	3.27	3.27	Long distance telephone
27	0307	.78	.78	Long distance telephone
27	0506	3.11	3.11	Long distance telephone
27	0606	16.76	16.76	Long distance telephone
27	0706	1.83	1.83	Long distance telephone
27	0806	30.51	30.51	Long distance telephone
27	0906	.63	.63	Long distance telephone
27	1006	.42		Long distance telephone
27	1106	8.13		Long distance telephone
27	1206	.99		Long distance telephone
Subtotal 27		77.75	77.75	Long distance telephone
3	0606	15.00		Duplicating (outside)
3	0706	14.70		Duplicating (outside)
3	0806	70.00		Duplicating (outside)
Subtotal 3		99.70	99.70	Duplicating (outside)
38	1206	.32		Communications expense
Subtotal 38		.32	.32	Communications expense
4	0906	11.04		Express delivery
Subtotal 4		11.04	11.04	Express delivery
47	0007	F 00	F 00	December 1 Community File
47	0207	5.30 1.60		Document Scan to File Document Scan to File
47	0306	1.80		Document Scan to File
47 47	1106	17.90		Document Scan to File
47	1206	5.30		Document Scan to File
Subtotal 47	1200	31.90		Document Scan to File
Subtotal 47		31.30	31.80	Document Scan to File
50	0306	19.63	10.63	Copy Charges
50	0506	72.93		Copy Charges
50	0606	34.06		Copy Charges
50	0706	.65		Copy Charges
50	0806	33.02		Copy Charges
50	0906	1.82		Copy Charges
50	1006	1.56		Copy Charges
50	1106	134.03		Copy Charges
Subtotal 50		297.70		Copy Charges
51	0506	7.00	7.00	Fax Charges
51	1006	7.00		Fax Charges
Subtotal 51		14.00		Fax Charges
8	0207	85.36	85.36	Mileage
8	0306	97.90		Mileage
8	0506	107.69		Mileage
8	0906	98.34		Mileage
8	1006	52.96		Mileage
8	1206	78.32	78.32	Mileage
Subtotal 8		520.57	520.57	Mileage